

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

Cotter Corporation (N.S.L.),	)	
	)	
Petitioner,	)	
v.	)	Case No. 4:19-mc-00774-AGF
	)	
United States of America, <i>et al.</i>	)	
	)	
Respondents.	)	

**REPLY IN SUPPORT OF REQUEST FOR RELIEF BY BRIDGETON LANDFILL, LLC,  
REPUBLIC SERVICES, INC., AND ALLIED SERVICES, LLC**

Respondents Bridgeton Landfill, LLC, Republic Services, Inc., and Allied Services, LLC hereby join in the Reply Brief in Support of its Renewed Request filed by the United States of America (Dkt. No. 55).

WHEREFORE, for the reasons described in detail by the United States of America, Cotter should be held to have waived its attorney-client privilege as to its decision to dispose of radioactive residues from Latty Avenue at the Westlake Landfill and provide previously withheld documents on those subjects to Respondents for potential use in follow-up questions to Mr. McGrath.

Dated: February 7, 2020

LATHROP GPM LLP

By: /s/ William G. Beck  
William G. Beck 26849MO  
Peter F. Daniel 33798MO  
Allyson E. Cunningham 64802MO  
2345 Grand Boulevard, Suite 2200  
Kansas City, Missouri 64108-2618  
Telephone: 816.292.2000  
Telecopier: 816.292.2001  
[William.Beck@lathropgpm.com](mailto:William.Beck@lathropgpm.com)  
[Peter.Daniel@lathropgpm.com](mailto:Peter.Daniel@lathropgpm.com)  
[Allyson.Cunningham@lathropgpm.com](mailto:Allyson.Cunningham@lathropgpm.com)

Attorneys for Respondents Bridgeton  
Landfill, LLC, Republic Services, Inc., and  
Allied Services, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above pleading was served via the U.S. District Court electronic filing system on this 7<sup>th</sup> day of February 2020.

/s/ William G. Beck  
Attorney for Respondents Bridgeton  
Landfill, LLC, Republic Services, Inc., and  
Allied Services, LLC